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8 IGNACIO JIMENEZ

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CLERK, U.S. DISTRICT COURT
DISTRICT OF NEVADA

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8 UNITED STATES DISTRICT COURT
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10 DISTRICT OF NEVADA

11 FEDERAL TRADE COMMISSION,) CV-S-97-00750-PMP (RL)
12 Plaintiff,)
13 vs.)
14 DAYTON FAMILY PRODUCTIONS, INC.;)
15 J.J. DAYTON ASSOCIATES, INC.; HIGH)
16 VOLTAGE PICTURES, INC.; HIGH)
17 VOLTAGE ENTERTAINMENT, INC.;)
18 AMERICAN FAMILY PRODUCTIONS, INC.;)
19 AZTEC ESCROW, INC.; REUNION)
20 MANAGEMENT, INC.; AMERICAN FAMILY)
21 CONSULTANTS, INC.; JOHN RUBBICO,)
22 individually and doing business as)
23 J.J. Family Film Productions; GLEN)
24 E. BURKE; KEVIN ROY; IGNACIO)
25 JIMENEZ; JOHN IAVARONE; FRED)
26 DAVIDSON; RICHARD S. HART; and)
27 RAYMOND FIOSI,)
28 Defendants.)

22 STIPULATION

23 IT IS HEREBY STIPULATED, by and between the FEDERAL TRADE
24 COMMISSION, by and through its counsel, GREGG SHAPIRO, and
25 BLAINE T. WELSH, Assistant U.S. Attorney, and Defendant, JOHN
26 IAVARONE, by and through his counsel, JOHN SPILOTRO, ESQ. of
27 SPILOTRO & KULLA, and Defendants, GLEN BURKE, IGNACIO JIMENEZ
28 and KEVIN ROY, by and through their attorney, SCOTT MICHAEL

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1 CANTOR, ESQ. of GRAZIADEI & CANTOR, LTD., as follows:

2 WHEREAS the FEDERAL TRADE COMMISSION filed a Motion for
3 Summary Judgment herein on or about February 12, 1998; and

4 WHEREAS counsel for the Defendants, above-referenced, have
5 had trial and travel schedules that have made a response to that
6 Motion within the time allowed by Rule impossible; and

7 WHEREAS the parties wish to allow the Defendants an
8 opportunity to respond to the Motion for Summary Judgment in
9 order that this matter may be resolved on the merits, the
10 parties hereto stipulate, as follows:

11 1. That the Defendants, JOHN IAVARONE, GLEN BURKE,
12 IGNACIO JIMENEZ and KEVIN ROY, shall have to and including March
13 30, 1998, in which to file their Opposition to the FEDERAL TRADE
14 COMMISSION'S said Motion for Summary Judgment and shall transmit
15 the same to Mr. Shapiro by Federal Express or other form of
16 overnight delivery so that it is received by Mr. Shapiro no
17 later than March 31, 1998.

18 2. That the FEDERAL TRADE COMMISSION may thereafter have
19 three weeks from receipt of the Opposition to file its reply;
20 the matter shall be deemed submitted upon the filing of the
21 Reply subject to the Court granting oral argument of the Motion;

22 3. In opposition to the Motion for Summary Judgment, the
23 Defendants will rely on evidence previously produced; no
24 evidence not heretofore produced, save and except for Affidavits

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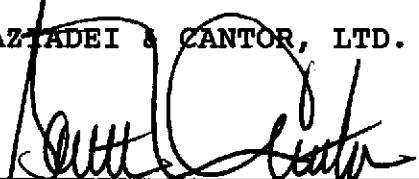
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1 of the parties-Defendant in opposition to the Motion, shall be
2 asserted in defense to the summary judgment Motion.

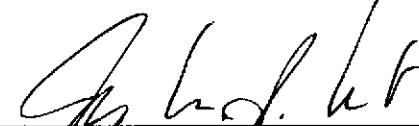
3 DATED this 26th day of March, 1998.

4 GRAZIADEI & CANTOR, LTD.



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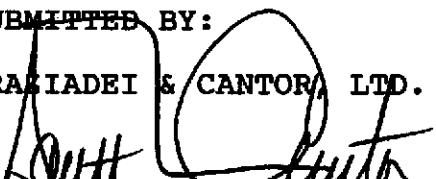
16 ORDER

17 BASED upon the foregoing and good cause appearing,
18 IT IS SO ORDERED.

19 DATED this 3rd day of April, 1998.

20 
21 DISTRICT JUDGE

22 SUBMITTED BY:
23 GRAZIADEI & CANTOR, LTD.



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